

1 DENNIS J. HERRERA, State Bar #139669
City Attorney
2 ELIZABETH SALVESON, State Bar #83788
Chief Labor Attorney
3 ANDREW GSCHWIND, State Bar #231700
Deputy City Attorney
4 Fox Plaza
1390 Market Street, Fifth Floor
5 San Francisco, California 94102-5408
Telephone: (415) 554-3973
6 Facsimile: (415) 554-4248
E-Mail: andrew.gschwind@sfgov.org
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8 Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 ANDREW KING,

13 Plaintiff,

14 vs.

15 CITY AND COUNTY OF SAN
FRANCISCO, PUBLIC UTILITIES
16 COMMISSION, SAN FRANCISCO WATER
DEPARTMENT, and DOES 1 to 25,

17 Defendants.
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Case No. CV-11-1857 WHA

DEFENDANT'S PRETRIAL DISCLOSURES

[FRCP 26(A)(3)]

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20 Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendant City & County of San
21 Francisco ("Defendant" or the "City"), submits the following pretrial disclosures.
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23 **I. TRIAL WITNESSES**

24 A. Defendant expects to call the following witnesses at trial:

25 Bill Teahan (party witness, contact through defense counsel);

26 Frank Marovich (party witness, contact through defense counsel);

27 Lorceli Braganza (party witness, contact through defense counsel);

28 Silvia Castellanos (party witness, contact through defense counsel);

1 Lori Regler (party witness, contact through defense counsel);

2 Jenee Jackson (party witness, contact through defense counsel);

3 B. Defendant may also call the following additional witnesses if the need arises:

4 John Mercurio (party witness, contact through defense counsel);

5 Andy Geddes (party witness, contact through defense counsel);

6 Fatima Taylor, California Pacific Medical Center/Sutter Health, P.O. Box 7999, San
7 Francisco, CA (415) 600-6000;

8 Daniel Null, M.D., 1701 Divisadero St., Suite 500, San Francisco, CA 94143 (415)
9 353-7300.

10 Custodian of Records for SFPUC

11 **II. WITNESSES WHOSE TESTIMONY THE CITY EXPECTS TO PRESENT BY**
12 **DEPOSITION**

13 Plaintiff.

14 **III. IDENTIFICATION OF EXHIBITS**

15 A. The City expects to offer the following documents or other exhibits at trial:

16 -Jan. 23, 2009 revised essential functions guide sent from Dr. Daniel Null to
17 Lorcelli Braganza with clarifying notes of Ms. Braganza from class with Dr. Null on 1/27/2009 (Ex. B
18 to SJ motion, CCSF 000469-71);

19 -Feb. 2, 2009 letter from Lorceli Braganza to Andrew King (Ex. C to SJ motion,
20 CCSF 000381-82);

21 -May 8, 2009 letter from Lorceli Braganza to Andrew King with attachments
22 (Ex. D to SJ motion, CCSF 000432-34);

23 -Feb 2, 2010 letter from Fatima Taylor to Andrew King (Ex. E to SJ motion,
24 CCSF 000406);

25 -Plaintiff's Feb. 2010 Reasonable Accommodation Request Form and
26 attachments (Ex. F to SJ motion, CCSF 000437-440);

27 -Feb. 15, 2010 letter of Dr. Daniel Null (Ex. G to SJ motion, CCSF 000441);

1 -Mar. 9, 2010 letter from Fatima Taylor to Andrew King (Ex. H to SJ motion,
2 CCSF 000401);

3 -Apr. 29, 2010 letter from Silvia Castellanos to Plaintiff (Ex. J to SJ motion,
4 CCSF 000399);

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6 B. The City may offer the following documents or other exhibits at trial if the need arises:
7 -portions of Plaintiff's deposition transcript for impeachment purposes
8 -SFERS Notification of [Plaintiff's] Intent to Retire dated April 14, 2010 (Ex. I
9 to SJ motion)

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11 Dated: August 20, 2012

12 DENNIS J. HERRERA
13 City Attorney
14 ELIZABETH S. SALVESON
15 Chief Labor Attorney
16 ANDREW GSCHWIND
17 Deputy City Attorney

18 By: /s/Andrew Gschwind
19 ANDREW GSCHWIND

20 Attorneys for Defendant
21 CITY AND COUNTY OF SAN FRANCISCO
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